

SIU



AFFILIATED WITH THE SEAFARERS INTERNATIONAL UNION OF NORTH AMERICA • AFL-CIO

SEAFARERS INTERNATIONAL UNION

ATLANTIC • GULF • LAKES AND INLAND WATERS DISTRICT

NATIONAL MARITIME UNION

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December 10, 2001

VIA FAX to (305) 865-7167
and VIA U.S. MAIL

J.H. Zidell, Esq.
300 71st Street, #605
Miami Beach, FL 33141

Re: Rodriguez et al. v. Crowley et al.
Civil Nos. 97-2437 (GG) and 98-1548 (GG)

Dear Mr. Zidell:

I am in receipt of Plaintiffs' Request for Admissions, Request to Produce Documents and Interrogatories, dated November 20, 2001. As you know, on July 7, 2000, the Seafarers International Union filed a Motion in Opposition to Plaintiffs' Motion to Compel Discovery. In its Motion, the Union took the position that it was too late for Plaintiffs to conduct further discovery. The SIU repeats its objections to further discovery by Plaintiffs, for all the reasons stated in the Motion of July 7, 2000.

Sincerely,


Ellen Silver

cc: Raquel M. Dulzaides, Esq.
Ana Rosa Biascoechea, Esq.
Luis Suárez, Esq.